

Section 1. Registration Information

Source Identification

Facility Name:	Yuma Express Cooling, LLC - Site #2
Parent Company #1 Name:	
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Revised PHA / Hazard Review due to process change (40 CFR 68.190(b)(5))
Description:	2009 RMP Update Submission
Receipt Date:	02-Feb-2012
Postmark Date:	02-Feb-2012
Next Due Date:	02-Feb-2017
Completeness Check Date:	10-Mar-2014
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0012 7873
Other EPA Systems Facility ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	4139 E. Gila Ridge Road
Street 2:	
City:	Yuma
State:	ARIZONA
ZIP:	85365
ZIP4:	
County:	YUMA

Facility Latitude and Longitude

Latitude (decimal):	32.682500
Longitude (decimal):	-114.561389
Lat/Long Method:	Interpolation - Photo
Lat/Long Description:	Center of Facility
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	24000

Owner or Operator

Operator Name:	Yuma Express Cooling, LLC
Operator Phone:	(928) 726-0478

Mailing Address

Operator Street 1:	C/O WPS
Operator Street 2:	2575 S. Avenue 4E
Operator City:	Yuma
Operator State:	ARIZONA
Operator ZIP:	85365
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Gary Elk
RMP Title of Person or Position:	WPS Compliance Manager
RMP E-mail Address:	garye@westernprecooling.com

Emergency Contact

Emergency Contact Name:	Gary Elk
Emergency Contact Title:	WPS Compliance Manager
Emergency Contact Phone:	(928) 726-0478
Emergency Contact 24-Hour Phone:	(928) 726-0478
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	garye@westernprecooling.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	

Local Emergency Planning Committee

LEPC:	Yuma County LEPC
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Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	18
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	

Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	04-Nov-2011
Last Safety Inspection Performed By an External Agency:	Fire Department

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:	The Cloud Company / Ray Cloud
Preparer Phone:	(805) 925-0265
Preparer Street 1:	529 Calle Grande
Preparer Street 2:	
Preparer City:	Santa Maria
Preparer State:	CALIFORNIA
Preparer ZIP:	93455
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.
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Process Chemicals

Process ID:	1000031639
Description:	Refrigeration System
Process Chemical ID:	1000038351
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	27000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000031639
Process NAICS ID:	1000031920
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000026086

Percent Weight:	100.0
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP*Comp(TM)
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Rural

Passive Mitigation Considered

Dikes:
Enclosures:
Berms:
Drains:
Sumps:
Other Type:

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000027934

Percent Weight:

Physical State:

Model Used:

Wind Speed (m/sec):

Atmospheric Stability Class:

Topography:

Gas liquified by pressure

EPA's RMP*Comp(TM)

3.0

D

Rural

Passive Mitigation Considered

Dikes:

Enclosures:

Berms:

Drains:

Sumps:

Other Type:

Active Mitigation Considered

Sprinkler System:

Deluge System:

Water Curtain:

Neutralization:

Excess Flow Valve:

Flares:

Scrubbers:

Emergency Shutdown:

Other Type:

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

Accident History ID: 1000021178

Date of Accident:	02-Dec-2011
Time Accident Began (HHMM):	1501
NAICS Code of Process Involved:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)
Release Duration:	000 Hours 10 Minutes

Release Event

Gas Release:	
Liquid Spill/Evaporation:	Yes
Fire:	
Explosion:	
Uncontrolled/Runaway Reaction:	

Release Source

Storage Vessel:	
Piping:	
Process Vessel:	
Transfer Hose:	
Valve:	
Pump:	
Joint:	
Other Release Source:	Condenser

Weather Conditions at the Time of Event

Wind Speed:	9.2
Units:	miles/h
Direction:	NNW
Temperature:	61
Atmospheric Stability Class:	B
Precipitation Present:	
Unknown Weather Conditions:	

On-Site Impacts

Employee or Contractor Deaths:	0
Public Responder Deaths:	0
Public Deaths:	0
Employee or Contractor Injuries:	1
Public Responder Injuries:	0
Public Injuries:	0
On-Site Property Damage (\$):	200000

Known Off-Site Impacts

Deaths:	0
Hospitalization:	0
Other Medical Treatments:	0
Evacuated:	35

Sheltered-in-Place:	0
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Off-Site Property Damage (\$):	0
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Environmental Damage

Fish or Animal Kills:

Tree, Lawn, Shrub, or Crop Damage:

Water Contamination:

Soil Contamination:

Other Environmental Damage:

Initiating Event

Initiating Event:

Human Error

Contributing Factors

Equipment Failure:

Human Error:	Yes
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Improper Procedures:

Overpressurization:

Upset Condition:	Yes
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By-Pass Condition:

Maintenance Activity/Inactivity:

Process Design Failure:

Unsuitable Equipment:

Unusual Weather Condition:

Management Error:

Other Contributing Factor:	Failure to complete procedure
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Off-Site Responders Notified

Off-Site Responders Notified:

Notified and Responded

Changes Introduced as a Result of the Accident

Improved or Upgraded Equipment:	Yes
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Revised Maintenance:

Revised Training:	Yes
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Revised Operating Procedures:	Yes
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New Process Controls:

New Mitigation Systems:

Revised Emergency Response Plan:

Changed Process:

Reduced Inventory:

None:

Other Changes Introduced:

Confidential Business Information

CBI Claimed:

Chemicals in Accident History

Accident Chemical ID:	1000016607
Quantity Released (lbs):	1100
Percent Weight:	100.0
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Flammable/Toxic:	Toxic

Section 7. Program Level 3

Description

The Process Safety Management Program applies to the entire closed-loop ammonia refrigeration system.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000032911
Chemical Name:	Ammonia (anhydrous)
Flammable/Toxic:	Toxic
CAS Number:	7664-41-7

Prevention Program Level 3 ID:	1000027423
NAICS Code:	115114

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	19-Jan-2012
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Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	19-Jan-2012
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The Technique Used

What If:	Yes
Checklist:	
What If/Checklist:	
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	15-Mar-2012

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	Yes
Floods (Flood Plain):	

Tornado:
Hurricanes:
Other Major Hazard Identified: Human Error

Process Controls in Use

Vents:
Relief Valves: Yes
Check Valves:
Scrubbers:
Flares:
Manual Shutoffs: Yes
Automatic Shutoffs: Yes
Interlocks:
Alarms and Procedures: Yes
Keyed Bypass:
Emergency Air Supply:
Emergency Power:
Backup Pump:
Grounding Equipment:
Inhibitor Addition:
Rupture Disks:
Excess Flow Device:
Quench System:
Purge System:
None:
Other Process Control in Use:

Mitigation Systems in Use

Sprinkler System: Yes
Dikes:
Fire Walls:
Blast Walls:
Deluge System:
Water Curtain:
Enclosure:
Neutralization:
None:
Other Mitigation System in Use: ammonia-water diffusion

Monitoring/Detection Systems in Use

Process Area Detectors: Yes
Perimeter Monitors:
None:
Other Monitoring/Detection System in Use:

Changes Since Last PHA Update

Reduction in Chemical Inventory: Yes
Increase in Chemical Inventory:
Change Process Parameters:
Installation of Process Controls: Yes
Installation of Process Detection Systems:

Installation of Perimeter Monitoring Systems:

Installation of Mitigation Systems:

None Recommended:

None:

Other Changes Since Last PHA or PHA Update: Equipment upgrades

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 24-Oct-2013

Training

Training Revision Date (The date of the most recent review or revision of training programs): 04-Jan-2012

The Type of Training Provided

Classroom: Yes
On the Job: Yes
Other Training: Online

The Type of Competency Testing Used

Written Tests: Yes
Oral Tests:
Demonstration: Yes
Observation: Yes
Other Type of Competency Testing Used:

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 04-Jan-2012

Equipment Inspection Date (The date of the most recent equipment inspection or test): 25-Nov-2011

Equipment Tested (Equipment most recently inspected or tested): Refrigeration System - IIAR Bulletin 109 Inspection

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures): 15-Dec-2011

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 04-Jan-2012

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review): 06-Nov-2011

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit): 04-Jan-2012

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 15-Jun-2012

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)): 02-Dec-2011

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation): 15-Jun-2012

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 04-Jan-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 04-Jan-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 04-Jan-2012

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance): 03-Jan-2012

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan): 28-Feb-2011

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees): 07-Nov-2011

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): City of Yuma Fire Department

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (928) 373-4850

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120:

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws: Yes

Other (Specify): CFR 1910.120(q); CFR 1910.119

Executive Summary

1 EXECUTIVE SUMMARY

- 1.1 Accidental Release Prevention and Emergency Response Policies.
- 1.2 General Description of the Stationary Source And Regulated Substances.
 - 1.3 Summary of the General Accidental Release Prevention Program and Chemical-Specific Prevention Steps
 - 1.4 Summary of the Five-Year Accident History.
- 1.5 Summary of the Emergency Response Program.
- 1.6 Planned Changes to Improve Safety.

1.1 Accidental Release Prevention and Emergency Response Policies

The Yuma Express Cooling, LLC - Site #2 (YEX2) Accidental Release Prevention and Emergency Response Policies are to simply not have accidental releases or emergencies. The company endeavors to execute these policies through the implementation of its Safety Program. The company safety program includes, but is not limited to a comprehensive Process Safety Management (PSM) Program. The PSM program is executed through YEX2's business partner, Western Precooling Systems (WPS). WPS is a stakeholder in the YEX2 operation and has offices and staff about 100 yards from the facility. PSM is specifically designed and intended to prevent accidental releases. It is the primary goal of YEX2 and WPS to protect employees, visitors and neighbors from harm due to company operations.

YEX2 has adopted a "non-responding facility" policy; has an established Emergency Action Plan and has taken the steps necessary to be included in the community emergency plan. An Emergency Coordinator has been established and coordination with the State Emergency Response Commission (SERC), Local Emergency Planning Committee (LEPC) and Fire Department is performed on an ongoing basis. Emergency response pre-planning is coordinated and kept current through the annual submittal of appropriate reports and periodic tours of the facility by the Fire Department.

WPS policy includes maintaining appropriate emergency capabilities and to deal with emergencies safely if and when they do happen. WPS employs ammonia technicians that have been 1910.120(q) Hazardous Material Technician certified. WPS supports RETA training and certifications for its technicians. WPS technicians are "on call" to the facility 24/7/365.

Each company strives to execute its emergency response policies through skilled employees that are provided with adequate and appropriate equipment and training (production workers contracted by YEX2 are trained for their emergency actions. Refrigeration Technicians employed by WPS are trained for their emergency actions).

1.2 General Description of the Stationary Source and Regulated Substances

The Yuma Express - Site #2 facility is located in Yuma, AZ in a commercial/industrial area outside the city. The facility was built in 1987; an expansion and upgrade project was completed in the latter part of 2011. The facility provides refrigeration effect for the removal of field heat from freshly harvested vegetables (produce) and subsequent short-term refrigerated storage. The product that comes to the facility for pre-cooling and subsequent short-term storage is on-site generally four days from harvesting. The facility is a seasonally operated plant with product harvest periods beginning in mid-November and finishing in early April.

The Regulated Substance in use is Anhydrous Ammonia, CAS #7664-41-7, which is used in a closed-loop mechanical refrigeration system. Pressure and temperature controls are installed in accordance with appropriate standards, including isolation and overpressure relief valves. At certain times of the year portable cooling equipment is required to augment the fixed equipment at the facility. Due to the seasonal operation of the Plant, the majority of ammonia refrigerant is removed and placed in storage vessels at the end of each season. The vessels are provided shade, traffic barriers and a water sprinkler system. The water sprinkler system reduces pressure and temperature by reducing the skin temperature of the vessels on very hot days in the Yuma area.

Operation of the facility is a coordinated effort. Yuma Express Cooling, LLC is an Arizona Limited Liability Company made up of Western Precooling Systems (WPS) - 50 % and a group of individuals and entities affiliated with American Growers Cooling LLC (AGCC) - 50 %. Yuma Express Cooling, LLC leases the site including stationary refrigeration equipment to AGCC. Separately, WPS leases portable refrigeration equipment to AGCC. Maintenance of the entire refrigeration system is the responsibility of WPS which has offices and staff about 100 yards from the site. WPS and AGCC work together to implement the Risk and Process Safety

Management Plan which is in the name of Yuma Express Cooling, LLC - Site # 2.

1.3 General Accidental Release Prevention Program and Chemical Specific Prevention Steps

Accidental Release Prevention Program

As noted above, a comprehensive Process Safety Management (PSM) Program has been established in accordance with 29 CFR 1910.119. The PSM Program is specifically intended to prevent accidental releases & promote the safe operation of ammonia-handling equipment and processes. PSM is an integral part of daily Plant operation. The written PSM document is maintained in the site's RMP/PSM Plan.

As noted above WPS is the company that inspects and performs mechanical maintenance of the ammonia refrigeration equipment. Schedules and written procedures for the operation and maintenance of ammonia-handling equipment, including the steps to be taken in the event of a release or threatened release, have been developed. The written procedures include necessary safety precautions for Plant operation, inspection, maintenance, and moving of portable equipment (Hydro-Vac[®]; Vacuum Tubes). As maintenance needs are determined, the need is expressed to the WPS Area Manager. Specific tasks for the expressed need is decided by the WPS Area Manager and entered into the service call system. Tasks are then tracked to completion through the service call system. Through a regular routine of inspect, discuss, assign and confirmation of completion, YEX2 and WPS have reduced equipment operational problems and also reduced the potential for releases.

WPS actively encourages its ammonia Technicians to seek Certification through the Refrigerating Engineers and Technicians Association (RETA). Technicians only perform tasks for which they have been pre-qualified.

Chemical-Specific Prevention Steps

It has become apparent in the industry that a mishap while draining oil from the system is one of the most common incidents to occur. Special self-closing valves are now used as a permissive for oil drain flow. If a release were to develop during the oil-draining task, the mechanic simply releases the handle of the self-closing valve and flow is terminated. The facility uses these types of valves at all of the oil drain points.

Other release prevention steps taken at YEX2 - Site #2:

- The facility has fencing and gates to limit access to the facility and to increase the security of the facility from potential "wrong-doers".
- A Security Service is employed on-site to control casual visitors (truck drivers reporting to pick-up produce).
- CCTV's are employed for site monitoring (added)
- An ammonia monitoring, sensing and warning system is installed.
- An Ammonia-Water Diffusion System was installed under supervision of the Yuma Fire Dept.
- There is a controlled pressure receiver installed for daily operational swing capacity.
- An evaporative cooling water sprinkler system is installed over the site's high pressure receiver vessel. This system reduces pressure during sustained hot weather.
- Employees are trained for hazard communication (discovery and communicating) for releases, fires, vandal's etc. Training is documented in each employees training record file.
- Staff is trained in the benefits of good housekeeping. The general appearance of the facility is maintained on a day-to-day basis.

1.4 Five-Year Accident History Summary

There has been one accidental ammonia release event in the last 5 years. The accident occurred on December 2, 2011 and resulted in the release of approximately 1100 lbs. of anhydrous ammonia. One Refrigeration Technician was admitted to the hospital. One Cooler employee was seen and released with no restrictions. There were no off-site injuries or other off-site consequences other than precautionary evacuations and a temporary road closure. 20 other people sought attention; there were no hospitalizations or other medical treatments of those people. An Incident Investigation was initiated on the day of the event.

1.5 The Emergency Response Program

The Emergency Response Program is divided into two elements, as only properly trained and qualified personnel are authorized to respond to emergencies. Production workers contracted by YEX2 are trained to notify and evacuate via the Plant's Emergency Action Plan. Only the Yuma Fire Department would respond to an emergency; support would be made available via WPS personnel trained to 29 CFR 1910.120(q) standards. Emergency equipment is maintained under the control of WPS. Written ammonia emergency procedures are detailed in the facility's "Thirty Minute Plan". Appropriate written plans are maintained on-site and updated on a regular basis. Local Emergency Response capabilities have been verified.

1.6 Planned changes to improve safety

Mechanisms to identify and plan safety improvements include (but are not limited to):

- Process Hazard Analysis revalidation/update;
- Compliance Audits;
- Routine maintenance (Mechanical Integrity Program);
- IIAR Bulletin 109 Inspections (IIAR minimum safety criteria for the safe operation of ammonia refrigeration process);
- WPS Inspection Protocol
- Incident Investigation Reports

Each of the Programs above may result in recommendations ranging from capital improvements to routine maintenance of the plant. Where necessary, Service Calls are established in parallel to identified needs. Current planned changes to improve safety are the result of PHA updates conducted on 10/10/2011 and 01/19/2012. A summary includes:

- A new self-closing oil drain at a manifold lift station;
- Install a Ranco two-stage thermostat;
- Confirm that a water temperature or flow switch is installed;
- Review the Fire Prevention Plan;
- Validate the prior PHA recommendations;
- Coordinate seismic evaluation with Fire Department;
- Replace an oil cooler;
- Revised equipment setup procedures; and,
- Revised training

Implementation of these measures has commenced according to the schedule set by the management of WPS.